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Attorneys for Defendant,
JULIA SOLOMON

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JULIA SOLOMON,

Defendant.

**ANSWER TO COMPLAINT;
DEMAND FOR JURY TRIAL**

20 Civ. 10468-MKV

1. This is the United States of America statement of its case that defendant is not required to admit, qualify or deny, but to the extent an answer is required: DENIES.

2. ADMITS.

3. ADMITS.

4. ADMITS.

5. ADMITS.

6. ADMITS.

7. ADMITS.

8. ADMITS.

9. ADMITS.

10. ADMITS.

11. ADMITS.

12. ADMITS.

13. ADMITS.

14. ADMITS.

15. DENIES

16. ADMITS Julia Solomon did not report that she had relationships with foreign financial institutions during 2003-2010, by June 30 of the respective following years. DENIES THE REMAINDER OF PARAGRAPH 16.

17. ADMITS the defendant's files contain memoranda from government agents making this statement as fact. DENIES the allegation until the government supplies copies of the alleged late filed FBAR's.

18. ADMITS the following consent forms exist:

- Consent form for 2003-2010 signed by defendant on September 20, 2012 and countersigned by the IRS on March 25, 2013, stating that the FBAR assessment statute was extended to December 31, 2014.

- Consent form for 2003-2010 signed by defendant on August 9, 2014 and countersigned by the IRS on August 21, 2014, stating that the FBAR assessment statute was extended to December 31, 2016.
- Consent form for 2003-2010 signed by defendant on April 20, 2016 and never countersigned by the IRS, stating that the FBAR assessment statute was extended to June 30, 2017.
- Consent form for 2003-2010 signed by defendant on February 10, 2017 and countersigned by the IRS on April 4, 2017, stating that the FBAR assessment statute was extended to December 31, 2018. DENIES the remainder of paragraph 18.

19. ADMITS.

20. ADMITS.

21. DENIES for lack of information.

22. DENIES for lack of information.

23. DENIES.

ADDITIONAL DEFENSES

1. The government allowed all the FBAR statutes of limitations to expire before the government made its assessments.

2. Defendant not required to file the subject FBARs.

3. Defendant acted in good faith and with reasonable cause regarding the FBAR filings.

DEMAND FOR JURY TRIAL

Defendant demands trial by jury of all issues in this case triable by a jury.

WHEREFORE, defendant respectfully requests that the Complaint be dismissed with prejudice upon a finding that the government allowed all of the FBAR assessment statutes to expire, or a finding that defendant was not required to file the subject FBAR's or, in any event, defendant had reasonable cause for any failure to timely file any FBAR and that she be awarded such relief as this court deems just including attorneys' fees and costs.

Dated: January 25, 2021
Pasadena, California

Respectfully submitted,



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